

Before the
TENNESSEE REGULATORY AUTHORITY

In the Matter of)
)
UNIVERSAL TELECOM, INC.)
Complainant)
)
v.)
)
BELLSOUTH)
TELECOMMUNICATIONS, INC.)
Defendant)

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Docket No. 01-00674
EXECUTIVE SECRETARY

MOTION FOR CONTINUANCE

Universal Telecom, Inc. ("Universal Telecom") respectfully requests that the Tennessee Regulatory Authority (the "Authority") defer action on this case to the same date as the Authority acts on Case Number 01-00613, involving the same parties and issues. In support of this motion, Universal Telecom, by counsel, states as follows.

1. This motion is closely related to BellSouth's motion to defer consideration of Universal Telecom, Inc.'s motion for judgment on the pleadings filed in Case Number 01-00613.

2. This case and Case Number 01-00613 (the subject of the BellSouth motion) involve the same parties and the same issues.

3. In a telephone conversation between Edward T. Depp, counsel to Universal Telecom, and Guy M. Hicks, counsel to BellSouth, it became apparent that neither party had been previously aware that the Authority had created this new case for approval of the interconnection agreement.

4. Because the two cases are so inextricably intertwined, the parties agreed that it would be fairer and more efficient for both to advocate their respective positions in one conference: the Authority's November 6, 2001, agenda conference.

5. Universal Telecom therefore respectfully requests that the Authority continue any consideration of or action on this case until the same date as the Authority's consideration of or action on Case Number 01-00613, preferably the November 6, 2001, agenda conference.

Respectfully submitted,



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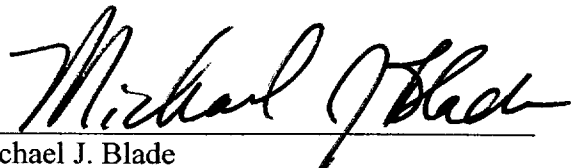
COUNSEL TO UNIVERSAL TELECOM, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served via first class United States mail, this 17th day of October, 2001, on:

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